

**REMARKS**

The present Amendment amends claims 2-4, 6 and 15, leaves claim 5 unchanged and cancels claims 1. Therefore, the present application has pending claims 2-6 and 15.

Claim 15 stands objected to under 37 CFR §1.75(c) as allegedly being a multiple dependant claim of an improper form. Amendments were made to claim 15 to make it dependent on claim 2. Therefore, this objection is overcome and should be withdrawn.

Claims 1, 3-6 and 15 stand rejected under 35 USC §103(a) as being unpatentable over Dabbieri (U.S. Patent No. 6,965,876) in view of Grajo article entitled ("Strategic Layout Planning and Simulation for Lean Manufacturing: A LayOPT Tutorial") and further in view of Brandeau article entitled "An Overview of Representative Problems in Location Research". As indicated above claim 1 was canceled. Therefore, this rejection with respect to claim 1 is rendered moot. This rejection with respect to the remaining claims 2-6 and 15 is traversed for the following reasons. Applicants submit that the features of the present invention as now more clearly recited in claims 2-6 and 15 are not taught or suggested by Dabbieri, Grajo or Brandeau whether taken individually or in combination with each other as suggested by the Examiner. Therefore, Applicants respectfully request the Examiner to reconsider and withdraw this rejection.

Amendments were made to the claims to more clearly describe features of the present invention as recited in the claims. Particularly, amendments were made to the claims to recite that the present invention is directed to a facility management system.

According to the present invention the facility management system includes flow line-measuring means for measuring a flow line of a moving body by detecting the moving body in a facility to be monitored and outputting flow line information based on the measuring of the flow line, and management information generating means for producing management information for management from the flow line information.

Further, according to the present invention the management information generating means includes moving means identifying means for identifying one of a plurality of moving means for moving the moving body from one location to another location, and movement cost-calculating means for calculating a cost expended on movement of the moving body from one location to another location by the moving means based on the flow line information.

Still further according to the present invention the flow line includes a plurality of sections corresponding to the plurality of moving means and the movement cost-calculating means calculates for each of the plurality of sections a total sum of values as the movement cost. Each of the values are calculated by multiplying a time unit price specific to one of the plurality of moving means for moving the identified moving body from one location to another location by a time period required for the movement. The time unit price is a value corresponding to the cost of moving the moving body per unit of time and the time period is the length of time it takes to move the moving body along the length of said flow line.

The above described features of the present invention now more clearly recited in the claims are not taught or suggested by any of the

references of record whether taken individually or in combination with each other. Particularly, the above described features of the present invention as now more clearly recited in the claims are not taught or suggested by Dabbieri, Grajo or Brandeau whether said references are taken individually or in combination with each other as suggested by the Examiner.

Dabbieri discloses flow line-measuring means, management information generating means and movement cost-calculating means.

Grajo discloses the flow line includes a plurality of sections and movement cost-calculating means which calculates for each of the plurality of sections a total sum of values the movement cost, each of the values being calculated by multiplying a time unit price by a time period required for the movement.

Brandeau discloses wherein the time unit price is a value corresponding to the cost of moving the moving body per unit of time and the time period is the length of time it takes to move the moving body along the length of said flow line.

However, neither Dabbieri, Grajo or Brandeau teach or suggest any elements corresponding to the moving means and the identifying means for identifying one of a plurality of moving means for moving said moving body as in the present invention.

Moreover, neither Dabbieri, Grajo or Brandeau teach or suggest that the plurality of sections included in the flow line correspond to the plurality of moving means or that a time unit price to be multiplied by a time period required for the movement is what is specific to one of said plurality of moving means for moving said identified moving body.

The moving means as recited in the claims is means for moving a moving body from one location to another location, wherein the moving body could be an employee working in the facility and the moving means is apparatus which moves the moving body from one location to another location.

For example, as illustrated in Fig. 11 of the present application, the elevator, escalator and walking paht correspond to the moving means. Since the running cost and the maintenance cost of the moving means are different depending on its type, accordingly, the costs required for moving the moving body are different depending on the type of moving means used to move the moving body from one location to the next location. For this reason, in the present invention, respective moving means are specified and the cost is calculated depending on the specified moving means, thereby the moving cost of the moving body can be determined extremely accurately.

On the contrary, such features as recited in the claims are not taught or suggested by neither of Dabbieri, Grajo nor Brandeau.

Thus, each of Dabbieri, Grajo and Brandeau fails to teach or suggest flow line-measuring means for measuring a flow line of a moving body by detecting the moving body in a facility to be monitored and outputting flow line information based on the measuring of the flow line, and management information generating means for producing management information for management from the flow line information as recited in the claims.

Further, each of Dabbieri, Grajo and Brandeau fails to teach or suggest that the management information generating means includes moving means identifying means for identifying one of a plurality of moving means for

moving the moving body from one location to another location, and movement cost-calculating means for calculating a cost expended on movement of the moving body from one location to another location by the moving means based on the flow line information as recited in the claims.

Still further each of Dabbieri, Grajo and Brandeau fails to teach or suggest that the flow line includes a plurality of sections corresponding to the plurality of moving means and the movement cost-calculating means calculates for each of the plurality of sections a total sum of values as the movement cost, wherein each of the values are calculated by multiplying a time unit price specific to one of the plurality of moving means for moving the identified moving body from one location to another location by a time period required for the movement and wherein the time unit price is a value corresponding to the cost of moving the moving body per unit of time and the time period is the length of time it takes to move the moving body along the length of said flow line as recited in the claims.

Therefore, since each of Dabbieri, Grajo and Brandeau suffers from the same deficiencies relative to the features of the present invention as now more clearly recited in the claims, combining the teachings of Dabbieri, Grajo and Brandeau in the manner suggested by the Examiner, does not render obvious the claimed invention. Accordingly, reconsideration and withdrawal of the 35 USC §103(a) rejection of claims 2-6 and 15 as being unpatentable over Dabbieri, Grajo and Brandeau is respectfully requested.

The remaining references of record have been studied. Applicants submit that they do not supply any of the deficiencies noted above with respect to the references utilized in the rejection of claims 1-6 and 15.

In view of the foregoing amendments and remarks, applicants submit that claims 2-6 and 15 are in condition for allowance. Accordingly, early allowance of claims 2-6 and 15 is respectfully requested.

To the extent necessary, the applicants petition for an extension of time under 37 CFR 1.136. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, or credit any overpayment of fees, to the deposit account of MATTINGLY, STANGER, MALUR & BRUNDIDGE, P.C., Deposit Account No. 50-1417 (503.41022X00).

Respectfully submitted,

MATTINGLY, STANGER, MALUR & BRUNDIDGE, P.C.

  

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